



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Jacob K. Javits Federal Building
26 Federal Plaza, 37th Floor
New York, New York 10278*

March 6, 2025

BY ECF

The Honorable Jeannette A. Vargas
United States District Judge
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

Re: *United States v. Ho*, 25-3 (JAV)

Dear Judge Vargas,

The parties respectfully submit this joint letter to request a modification of some of the conditions of the defendant's pretrial release. Specifically, the parties request the following conditions be modified:

- Travel is restricted to Southern District of New York, Eastern District of New York, Central District of California, and all points of travel between for court appearances. In addition, the defendant may travel within all districts within California subject to prior approval by Pretrial Services. The defendant is not permitted to enter a certain perimeter of the southern border to be set by Pretrial Services.
- Curfew is lifted. The defendant will continue to be subject to stand-alone GPS monitoring. The defendant is not permitted to enter any airports within the Central District of California without prior approval by Pretrial Services for Court appearances. Pretrial Services will set the perimeter.
- No trading by the defendant's company, One R Squared in any financial products, including securities, commodities, or cryptocurrency. Trading by the defendant is

